MOTION FILED
FEB -7 1989

No. 88-293

IN THE

Supreme Court of the United States

OCTOBER TERM, 1988

COMMUNITY FOR CREATIVE NON-VIOLENCE, et al.,

Petitioners,

vs.

JAMES EARL REID,

Respondent.

ON WRIT OF CERTIORARI TO THE
UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT

MOTION OF VOLUNTEER LAWYERS FOR THE ARTS INC., BARBARA RINGER, JOHN HERSEY, AND JOHN M. KERNOCHAN, AS AMICI CURIAE, FOR LEAVE TO FILE A BRIEF AMICUS CURIAE IN SUPPORT OF THE RESPONDENT

IRWIN KARP
(Counsel of Record)
40 Woodland Drive
Port Chester, New York
(914) 939-5386

Attorney for Amici Curiae

No. 88-293

In The
Supreme Court of the United States

October Term, 1988

COMMUNITY FOR CREATIVE NON-VIOLENCE, et al.,

Petitioners,

v.

JAMES EARL REID,

Respondent.

ON WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF COLUMBIA CIRCUIT

MOTION FOR LEAVE TO FILE A BRIEF AS AMICUS CURIAE IN SUPPORT OF RESPONDENT

Volunteer Lawyers for the Arts, Inc. ("VLA"), Barbara Ringer, John Hersey, and John Kernochan respectfully move for leave to file the brief amicus curiae they submitted to the Court and served on the parties' attorneys.

Those attorneys consented to the

filing of the brief on behalf of VLA, and the respondent's attorney informed the Clerk's office that he also consents to its filing on behalf of Ms. Ringer, Mr. Hersey and Professor Kernochan. However, petitioner's attorney informed the Clerk's office, and amici's attorney, that he does not consent to filing of the brief on their behalf.

The issue presented, and the legislative history on which it turns, are of serious concern to the individual amici curiae (as well as to VLA), and they have substantial reasons for urging that the Court allow their brief, and the arguments it presents, to be submitted for them, as well as for VLA.

Ms. Ringer, a former Register of Copyrights, played a leading role in preparing the 1976 Copyright Act. Mr. Hersey was, for several years, President

of the Authors League of America, which participated in the discussions and compromises that are relevant to interpreting the "work-made-for-hire" definitions at issue in this appeal. Professor Kernochan has been concerned with the issue as a professor of law at Columbia Law School, and as director of its Center for Law and the Arts.

The individual amici earnestly believe the views expressed in the brief on their behalf may be of use to the Court, and respectfully ask the Court's permission to file the brief in their names as well as in VLA's name.

Respectfully submitted,

IRWIN KARP,
Attorney for amici curiae
VLA, Ringer, Hersey and
Kernochan

February 7, 1989